

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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ESTATE OF MICHAEL EDWARD BELL, by  
Special Administrator Michael Martin Bell,  
KIM MARIE BELL,  
MICHAEL MARTIN BELL, and  
SHANTAE BELL,

Plaintiffs,

vs.

Case No. 05-C-1176

OFFICER ERICH R. STRAUSBAUGH,  
OFFICER ERICH S. WEIDNER,  
LIEUTENANT DAVID H. KRUEGER,  
OFFICER ALBERT B. GONZALES,  
KENOSHA POLICE DEPARTMENT,  
c/o CHIEF OF POLICE DANIEL C. WADE,  
and CITY OF KENOSHA,

Defendants.

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**AFFIDAVIT OF KEVIN P. REAK IN OPPOSITION TO  
PLAINTIFFS' MOTION TO SEQUESTER DEFENDANTS**

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STATE OF WISCONSIN     )  
                                      ) SS  
MILWAUKEE COUNTY     )

Kevin P. Reak, being duly sworn on oath deposes and states the following:

1. My name is Kevin P. Reak. I am an attorney licensed to practice law in the State of Wisconsin and am one of the attorneys for the defendants.

2. I am making this affidavit in opposition to plaintiffs' motion to sequester defendants.

3. Kim Bell was deposed on Monday, March 6, 2006. Plaintiffs Michael M. Bell and Shantae Bell were present during her deposition.

4. Shantae Bell was deposed on Monday, March 6, 2006. Plaintiffs Michael M. Bell and Kim Bell were present during her deposition.

5. Attached hereto as Exhibit A is a true and accurate copy of the Statement Kim M. Bell gave to a private detective employed by her family on November 12, 2004.

6. Attached hereto as Exhibit B is a true and accurate copy of the Statement Shantae M. Bell gave to a private detective employed by her family on November 10, 2004.

7. Attached hereto as Exhibit C is a true and accurate copy of the Kenosha Police Department Statement of Brian M. Rocco dated November 9, 2004.

8. Attached hereto as Exhibit D is a true and accurate copy of the Statement Craig D. El gave to a private investigator employed by the Bell family on November 11, 2004.

9. Attached hereto as Exhibit E is a true and accurate copy of the Statement Craig D. El gave to the Kenosha Police Department on November 12, 2004.

10. Attached hereto as Exhibit F is a true and accurate copy of the Statement Charlene R. Nejedly gave to the Kenosha Police Department on November 12, 2004.

11. Attached hereto as Exhibit G is a true and accurate copy of the Statement Charlene R. Nejedly gave to the private investigator employed by the Bell family on November 14, 2004.

12. Attached hereto as Exhibit H is a true and accurate copy of the Statement Francis W. Clark gave to the Kenosha Police Department on November 11, 2004.

13. Attached hereto as Exhibit I is a true and accurate copy of the Statement Francis W. Clark gave to the private investigator employed by the Bell family on November 12, 2004.

14. Attached hereto as Exhibit J is a true and accurate copy of the Statement Laurie L. Vaughn gave to the Kenosha Police Department on November 12, 2004.

/s/ Kevin P. Reak  
Kevin P. Reak

Subscribed and sworn to before me  
this 8<sup>th</sup> day of March, 2006.

/s/ Toni M. Phillips  
Notary Public, State of Wisconsin.  
My commission expires 071507.